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ANO 2
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Byron 1 & 2
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Sequoyah 1 & 2
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Wolf Creek Nuclear Operating Corp.
Wolf Creek

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Korea Hydro & Nuclear Power Co.
Kori 1 - 4
Ulchin 3 & 4
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Krško
Spanish Utilities
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WOG-03-363

July 21, 2003

Addendum 1 to WCAP-14572 Rev. 1-NP-A
Project Number 694

Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Attention: Chief, Information Management Branch,
Division of Program Management

Subject: Westinghouse Owners Group
Transmittal of WCAP-14572 Revision 1-NP-A Addendum 1 Table
2-1 Changes to Address the NRC Request for Additional
Inspection Screening Information

In December 1999, the Westinghouse Owners Group (WOG) transmitted Addendum 1 to WCAP-14572, Rev. 1-NP-A, "Addendum to 'Westinghouse Owners Group application of Risk-Informed Methods to Piping Inservice Inspection Topical Report' to Address Changes to Augmented Inspection Requirements," to the NRC for review and approval (Ref. 1). In June 2000, the WOG transmitted revised pages to WCAP-14572, Rev. 1-NP-A Addendum 1 to the NRC in response to comments and questions from the March 8, 2000 meeting between the NRC and the WOG (Ref. 2 and 3). In December 2002, the WOG transmitted additional information and changes to WCAP-14572, Rev. 1-NP-A Addendum 1 as requested by the NRC and as discussed at the September 25, 2002 meeting between the NRC and the WOG (Ref. 4, 5 and 6).

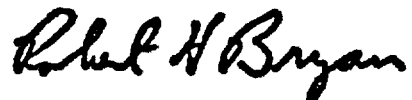
Based on a July 10, 2003 conference call between the WOG and the NRC, the WOG has agreed to make additional changes to WCAP-14572, Rev. 1-NP-A Addendum 1 to ensure a minimum inspection coverage in the piping designated under the existing plant Break Exclusion Region. Please find enclosed changes to WCAP-14572, Rev. 1-NP-A Addendum 1, Table 2-1, *Additional Clarification for WCAP-14572, Revision 1-NP-A to Allow Changes to Augmented Inspection Requirements*. These changes, along with the changes previously submitted to the NRC (Ref. 2 and 6), will be incorporated into the approved version of Addendum 1 to WCAP-14572, Rev. 1-NP-A following receipt of the Safety Evaluation. The WOG requests that the NRC complete their review and issue a Safety Evaluation by August 31, 2003 to support the Fall 2003 outages.

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If you require further information, feel free to contact Mr. Steve Lurie, Owners Group Project Office at 860-731-6241.

Very truly yours,

A handwritten signature in black ink, reading "Robert H. Bryan". The signature is written in a cursive style with a large, stylized "R" and "B".

Robert H. Bryan, Chairman
Westinghouse Owners Group

Enclosure

WOG-03-363
July 21, 2003

References:

1. Westinghouse Owners Group Letter, L. Liberatori (WOG) to S. Bloom (NRC) "Inclusion of Augmented Piping Inspection Programs into the WOG Risk-Informed ISI Program – WCAP-14572, Revision 1-NP-A Addendum 1," December 21, 1991, OG-99-099.
2. Westinghouse Owners Group Letter, K. Jacobs (WOG) to S. Bloom (NRC), "Transmittal of Revised Pages for WCAP-14572, Revision 1-NP-A Addendum 1, Addendum to Westinghouse Owners Group Application of Risk-Informed Methods to Piping Inservice Inspection Topical Report to Address Changes to Augmented Inspection Requirements," June 2, 2000, OG-00-050.
3. NRC Memorandum, S. Bloom to S. Richards, "Summary of March 8, 2000 Meeting with Westinghouse and Westinghouse Owners Group to Discuss Risk-Informed Inservice Inspection Addendum to WCAP-14572," May 3, 2000.
4. NRC Letter, S. Dembeck (NRC) to R. Bryan (WOG), "Addendum to Westinghouse Owners group application of Risk-Informed Methods To Piping Inservice Inspection Topical Report To Address Changes To Augmented Inspection Requirements," March 8, 2001.
5. Email, G. Shukla (NRC) to D. Weakland (FENOC), G. Bischoff (Westinghouse), et al, "Proposed WOG HELB Submittal Contents (WCAP-14572)," October 4, 2002.
6. Westinghouse Owners Group Letter, R. Bryan (NRC) to Chief, Information Management Branch, Division of Inspection and Support Programs, "WOG Response to NRC Request for Additional Information to Support the Review of WCAP-14572 Revision 1-NP-A Addendum 1-Markup," December 20, 2002, OG-02-057.

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July 21, 2003

cc: WOG Steering Committee
 WOG Management Committee
 WOG Materials Subcommittee Representatives
 D. Holland, USNRC OWFN 07 E1 (1L, 1E) (via Federal Express)
 S. Dinsmore, USNRC (1L, 1E) OWFN 10H4
 Project Management Office
 H. A. Sepp
 J. D. Andrachek
 K.R. Balkey
 C. L. Boggess
 G. A Brassart
 P. R. Stevenson

Changes to Table 2.1 Additional Clarification for WCAP-14572, Revision 1-NP-A to Allow Changes to Augmented Inspection Requirements

<p>Page 144, Section 3.6.3, Expert Panel</p>	<ul style="list-style-type: none"> Plant-specific expert panel guidance should be developed for this process or guidance from other risk-informed applications (e.g., Maintenance Rule) may be used as part of this process to ensure consistency across the risk-informed applications. 	<ul style="list-style-type: none"> Plant-specific expert panel guidance should be developed for this process or guidance from other risk-informed applications (e.g., Maintenance Rule) may be used as part of this process to ensure consistency across the risk-informed applications. Programs that consider piping classifications in addition to the piping designated as part of the Break Exclusion Region would perform additional screening for possible High Safety Significance classification. The screening would consist of the following for the segments that constitute the Break Exclusion Region: <ol style="list-style-type: none"> Individual segment contribution to Core Damage Frequency is greater than or equal to $1E-8$ per year. Individual segment contribution to Large Early Release Frequency is greater than or equal to $1E-9$ per year. <u>The expert panel will re-classify any BER piping segment that was initially classified as LSS to HSS, if the failure of that piping segment would result in a loss of more than one train of a mitigation function that is modeled in the PRA.</u> <u>Break Exclusion Region inspections fall significantly below 10% of the licensed total Break Exclusion Region scope.</u> <p>The additional screening of the segments that constitute the Break Exclusion Region piping would result in additional inspections unless plant specific design features or analysis is specifically credited to mitigate any concerns and justify a low safety significance ranking.</p> <p><u>If the number of risk-informed inspections in the break exclusion region (BER) piping is less than 2% of the total number of BER inspections performed in the region prior to the risk-informed evaluation, then the expert panel will request that additional BER segments be added to the inspection program to reach a minimum sampling of 2% of the original BER program inspections. The additional piping segments recommended to the expert panel shall be selected based on the piping segments that resulted in the highest contribution to CDF and LERF as determined by the risk ranking evaluation.</u></p>
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